

COPY

Before the
Federal Communications Commission
Washington, D.C. 20554

Application by Verizon Virginia Inc.,)
Verizon Long Distance Virginia Inc.,)
Verizon Enterprise Solutions Virginia) WC Docket No. 02-214
Inc., Verizon Global Networks Inc., and)
Verizon Select Services of Virginia Inc.,)
for Authorization To Provide In-Region,)
InterLATA Services in Virginia)

**COMMENTS OF
Z-TEL COMMUNICATIONS, INC.**

Z-Tel Communications, Inc. ("Z-Tel"), by its attorneys, hereby submits its comments in response to the Federal Communication Commission's ("FCC" or "Commission") Public Notice (DA 02-1893) in the above-captioned proceeding. The Public Notice invites interested parties to respond to the Application of Verizon Virginia Inc. et al. (collectively "Verizon") to provide in-region, interLATA services in the Commonwealth of Virginia, pursuant to section 271 of the Communications Act of 1934, as amended ("Act").

I. INTRODUCTION AND SUMMARY

Z-Tel is a Tampa, Florida-based competitive local exchange carrier ("CLEC") that offers bundled packages of local, long distance, and enhanced services to residential customers using the combination of unbundled network elements ("UNEs") known as the UNE Platform, or "UNE-P." At present, Z-Tel provides integrated local, long distance, and enhanced services to approximately 200,000 consumers in 38 states, including the Commonwealth of Virginia.

By these comments, Z-Tel opposes Verizon's Application for section 271 relief in Virginia because Verizon has failed and continues to fail to satisfy competitive checklist item

two, which requires Verizon to provide nondiscriminatory access to unbundled network elements (“UNEs”).¹ Specifically, Verizon lacks the ability to render accurate billing information to CLECs in Virginia, and therefore Verizon has not and is not providing CLECs with nondiscriminatory access to the operations support system (“OSS”) UNE. Thus, Verizon has failed to satisfy checklist item two, and the Commission must reject Verizon’s Application.

Verizon clearly wants section 271 relief in Virginia, and Z-Tel has no doubt that Verizon has the ability to perform all of the operational steps necessary to satisfy the competitive checklist. At a minimum, the Commission should require Verizon to render bills to CLECs in Virginia that are equal in quality and accuracy to those in Massachusetts and New York. To date, Verizon has not done so, and the Commission should therefore reject Verizon’s application.

II. VERIZON’S APPLICATION FAILS TO SATISFY CHECKLIST ITEM TWO BECAUSE VERIZON HAS NEVER RENDERED AN ACCURATE BILL TO COMPETITORS

Section 271(c)(2)(B)(ii) requires a BOC to provide “nondiscriminatory access to network elements in accordance with sections 251(c)(3) and 252(d).”² The Commission “has determined that access to OSS functions falls squarely within an incumbent LEC’s duty under section 251(c)(3) to provide unbundled network elements under terms and conditions that are nondiscriminatory and just and reasonable.”³ Thus, in order to demonstrate compliance with the competitive checklist, a BOC must show that it is providing just, reasonable, and nondiscriminatory access to OSS, including the billing component of the OSS UNE. Verizon

¹ 47 U.S.C. § 271(c)(2)(B)(ii).

² 47 U.S.C. § 271(c)(2)(B)(ii).

³ *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, Memorandum Opinion and Order, FCC 99-404, ¶ 84 (rel. Dec. 22, 1999) (“New York 271 Order”).

has failed to do so because its billing system simply does not work. Thus, the Commission should reject Verizon's application.

A. The Commission Has a Well-Defined Standard for Reviewing BOC OSS Compliance, Including the Billing Component of OSS

In analyzing whether a BOC is providing adequate OSS access, the Commission analyzes each of the primary OSS functions – pre-ordering, ordering, provisioning, maintenance and repair, and billing – through a two-part inquiry. “First, [the Commission] determine[s] whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions.... [The Commission] next assess[es] whether the OSS functions that the BOC has deployed are operationally ready as a practical matter.”⁴

Specific to the billing component of OSS, a BOC must demonstrate that it provides “competing carriers with complete and accurate reports on the service usage of competing carriers’ customers in substantially the same time and manner that it provides such information to itself, and a wholesale bill in a manner that gives competing carriers a meaningful opportunity to compete.”⁵ In making such an inquiry, the Commission evaluates a BOC’s billing

⁴ *Id.*, ¶ 88 (emphasis added) (citations omitted) (internal quotations omitted).

⁵ *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum Opinion and Order, FCC 01-130, ¶ 97 (rel. Apr. 16, 2001) (“Massachusetts 271 Order”). *See also*, *Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996, to Provide In-Region, InterLATA Services in Texas*, CC Docket No. 00-65, Memorandum Opinion and Order, FCC 00-238, ¶ 210 (rel. June 30, 2000) (“Texas 271 Order”) and *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, CC Docket No. 00-217,

processes and systems and billing performance metrics.⁶ The Commission also has looked at whether billing issues presented are competitively significant.⁷ Verizon's Application fails on all of these counts.

B. Verizon Has Failed to Satisfy the Commission's Well-Defined Standard for the OSS Billing Component

As demonstrated below, Verizon's (1) billing processes and systems are inadequate and (2) billing problems have created significant competitive issues for Z-Tel. As such, the Commission should reject Verizon's Application.

1. Verizon's billing processes and systems are inadequate

At the outset, Verizon admits that "the Commission has not previously reviewed the expressTRAK system in Virginia, which is an integrated ordering and billing system....."⁸

In certain previous applications, the Commission has been able to rely on the BOC's use of the same wholesale billing system across states to demonstrate checklist compliance.⁹ This does not hold true for the present Application, and therefore the Commission needs to carefully consider issues related to Verizon's wholesale billing in Virginia.

Z-Tel has been providing UNE-P-based residential service in Virginia since November 2000.

Over that time period, Verizon has never once rendered an accurate bill – in either paper or electronic format – to Z-Tel.

Memorandum Opinion and Order, FCC 01-29, ¶ 163 (rel. Jan. 22, 2001) ("Kansas/Oklahoma 271 Order").

⁶ *Id.*

⁷ Massachusetts 271 Order, ¶ 98 (noting that exceptions related to billing issues were not "competitively significant").

⁸ Verizon Brief at 69.

⁹ Kansas/Oklahoma 271 Order, ¶ 163 ("SWBT explains that it provides competing carriers with billing information [in Kansas and Oklahoma] ... using the same processes and systems as it uses in Texas.").

Verizon continues to bill Z-Tel using two different billing systems, which effectively doubles the effort that Z-Tel must expend in order to review, audit, and dispute Verizon's bills. Worse yet, both of Verizon's billing systems are significantly flawed, and Verizon has never once rendered an accurate bill. Verizon's billing problems are material and wide ranging. For example, Verizon continues to bill Z-Tel for various taxes, even though Z-Tel provided Verizon with a proper tax exemption form nearly two years ago.¹⁰ Verizon also continues to bill Z-Tel for calling features (*e.g.*, such as *69, speed dialing, and call waiting), even though these items are included in the price of the various UNEs that Z-Tel purchases.¹¹ In addition, Verizon inappropriately bills Z-Tel for a wide array of retail services, such as Lifeline, Guardian, and voicemail services.¹² Quite frankly, Verizon's billings systems in Virginia are an absolute mess.¹³

Z-Tel is able to identify the above-referenced billing issues from Verizon's electronic bill. As noted, however, Verizon also renders to Z-Tel a wholly separate paper bill, which covers charges associated with a significant number of Z-Tel's Virginia customers. Verizon's paper bill is virtually impossible to audit.¹⁴

Adding insult to this injury, Verizon's billing dispute resolution procedures are totally inadequate. Z-Tel presently has 141 outstanding billing disputes with Verizon, and the majority of these disputes have been open for more than 90 days.¹⁵ Even in cases where Verizon does resolve a dispute, Verizon's systems do not recognize when a dispute is credited unless it is

¹⁰ Declaration of Justin T. Laughlin, ¶ 6 ("Laughlin Declaration"), attached hereto at *Tab A*.

¹¹ *Id.*, ¶ 7.

¹² *Id.*, ¶ 8.

¹³ *See, id.*, ¶¶ 9-11, 15-16 for a discussion of additional billing problems.

¹⁴ *Id.*, ¶ 14.

done manually, adding time and complication to an already cumbersome process.¹⁶ Z-Tel simply should not have to dedicate significant resources to Verizon billing disputes, but that is presently the case in Virginia.

The Commission has repeatedly stated, “the most probative evidence that OSS functions are operationally ready is actual commercial usage.”¹⁷ Only in cases where actual commercial usage does not exist will “the Commission ... consider the results of carrier-to-carrier testing, independent third-party testing, and internal testing in assessing the commercial readiness of a BOC’s OSS.”¹⁸

2. Verizon’s Billing Problems Have Created Significant Competitive Issues for Z-Tel

In the Texas Order, the Commission noted that billing issues “can cause direct financial harm to competing carriers.”¹⁹ Verizon’s billing problems are “competitively significant”²⁰ for Z-Tel and deprive Z-Tel of a meaningful opportunity to compete. The level of billing disputes Z-Tel faces in Virginia is material. Indeed, Z-Tel’s total current dispute with Verizon in Virginia totals three-and-a-half times Z-Tel’s average monthly billing.²¹ By contrast, Z-Tel disputes only two-to-three percent of its bill in states such as Massachusetts, New York, and Texas. At a time where every dollar counts for CLECs, paying substantial overcharges to Verizon and then fighting Verizon for subsequent credits creates a significant competitive issue for Z-Tel.

¹⁵ *Id.*, ¶ 18.

¹⁶ *Id.*, ¶ 19.

¹⁷ *See* New York 271 Order, ¶ 89.

¹⁸ *Id.*

¹⁹ Texas 271 Order, ¶ 211.

²⁰ Massachusetts 271 Order, ¶ 98.

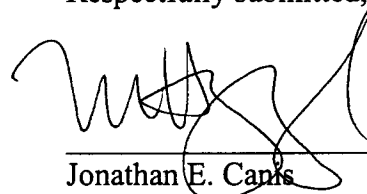
²¹ Laughlin Declaration, ¶ 5.

In addition to the direct financial harm to Z-Tel, on-going billing and auditing problems unfairly raise Z-Tel's cost of doing business in Virginia. Z-Tel simply should not be required to have an auditing team in place indefinitely to identify and attempt to rectify Verizon's shoddy billing performance.

III. CONCLUSION

Consistent with the foregoing, the Commission should reject Verizon's Application.

Respectfully submitted,



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Dated: August 21, 2002

ATTACHMENT 1

**Before the
Federal Communications Commission
Washington, D.C. 20554**

Application by Verizon Virginia Inc.,)	
Verizon Long Distance Virginia Inc.,)	
Verizon Enterprise Solutions Virginia)	WC Docket No. 02-214
Inc., Verizon Global Networks Inc., and)	
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**DECLARATION OF JUSTIN T. LAUGHLIN
ON BEHALF OF Z-TEL COMMUNICATIONS, INC.**

1. My name is Justin T. Laughlin. My business address is 601 South Harbour Island Boulevard, Suite 220, Tampa, Florida, 33602. I am employed by Z-Tel Communications Inc. as a LEC Relations Manager. In that role, I am responsible for managing all aspects of Z-Tel's wholesale relationship with Verizon. During my tenure here at Z-Tel I have managed two major functional groups, Customer Relations and Billing Research. I have also acted as a business analyst driving process improvement for all of business operations. This cross-departmental exposure has given me a broad understanding of Z-Tel's procedures and operations as a CLEC marketing UNEP services to residential and commercial customers.

2. Prior to my current position, I worked for MCI Worldcom for approximately two years.

I. PURPOSE OF DECLARATION

3. The purpose of this declaration is to describe the problems that Z-Tel has had with the wholesale bills sent by Verizon for the state of Virginia, and the impact that those problems have had on our ability to operate effectively in Virginia.

4. Z-Tel began providing service to residential customers in November 2000. Since that time, Verizon has had many inaccuracies in their wholesale bills. Also, Verizon has not been able to provide Z-Tel with a uniform electronic bill format because Verizon's Virginia customers are billed from two different billing systems. Verizon has further complicated wholesale billing reconciliation by creating additional billing accounts, which were not needed or requested by Z-Tel. In January 2002, Verizon attempted to consolidate Z-Tel's Virginia customers to our originally requested billing accounts and has failed to do so. In recent weeks Verizon has taken steps to resolve long-standing disputes and reported system problems prior to this hearing.

II VERIZON CONTINUES TO SEND Z-TEL INACCURATE WHOLESALE BILLS

5. Z-Tel's current dispute with Verizon for the state of Virginia totals three and a half times our average monthly billing. This amount represents the aggregate of all 141 outstanding disputes with Verizon for billing inaccuracies from the time Z-Tel began offering service in Virginia.

6. Z-Tel continues to incur tax charges on its wholesale bills even though it has filed the proper tax exemption forms in October of 2000¹. The state of Virginia's blanket certificate of resale acts as tax exemption that allows for Z-Tel to collect taxes for these services from its retail customers thus negates Verizon assessing these taxes on Z-Tel's wholesale customers. Verizon should not assess taxes on Z-Tel's wholesale bills.

7. Verizon has continued to bill Z-Tel for such ancillary services such as dial tone, *69, call forwarding, speed dialing, and call waiting. These services are included in the monthly

¹ Z-Tel Communications tax exemption form (attachment A)

port charge and should not be being billed as separate billable charges. Z-Tel has and will continue to dispute any feature charges that are inclusive of our monthly port charge.

8. Z-Tel continues to receive charges for services such as Lifeline, Guardian, local calling packages, and voicemail services. These types of services have not been ordered or utilized by Z-Tel, nor are they available with UNE-P service. Z-Tel will continue to dispute such charges.

9. Verizon is currently billing items under phrase code descriptions that are vague and are not associated with a specific Z-Tel customer. Some examples of such phrase code descriptions are usage, miscellaneous charges, out of BR local service, unknown local service, and unknown OC&C. Z-Tel can not reconcile these charges without further explanation as to what these charges are and which Z-Tel customer has utilized them. Z-Tel has continually asked Verizon for further explanation of these charges and has not been provided an adequate response. Z-Tel will continue to dispute such charges.

10. Since January 2002, Verizon has been billing Z-Tel for alternately billed calls such as collect and IPS calls as OSDA calls. These calls being mislabeled make it impossible for Z-Tel to appropriately determine what services the customer has actually utilized. We are disputing all alternately billed calls that are not labeled correctly. In addition, Verizon is requesting ANI detail to substantiate our dispute. However, BDT does not provide this level of detail. Verizon is asking for us to provide ANI detail by analyzing our daily usage file, which would be cumbersome and not cost-effective for Z-Tel². Since Verizon is incorrectly billing these charges and Verizon is the source of the daily usage file, it should have all the information it needs to correct the error.

² Email from Verizon requesting additional information by ANI (attachment B)

11. In October of 2001 Z-Tel identified a Verizon system problem that was excessively inflating the minutes of usage being billed to us in Virginia for our customers. Once reported to Verizon, they created a ticket to resolve the issue. To this date Verizon has not confirmed that the issue has been resolved. On June 5, 2002 we received an invoice for an amount 1/15th of our bill received May 5, 2002 a dramatic decrease, which leads us to believe that the issue may have recently been resolved.

III. VERIZON CONTINUES TO USE TWO WHOLESALE BILLING SYSTEMS IN VIRGINIA

12. Verizon has been placing Z-Tel's customers on two wholesale billing systems. ExpressTRAK is the system that houses the majority of Z-Tel's customers. ExpressTRAK generates bills to be sent to Z-Tel from Verizon in an electronic format (BDT) which allows Z-Tel to more accurately reconcile its bills against its own retail customers. Verizon had continued to place a smaller portion of Z-Tel's customers in their Legacy system. Verizon's Legacy system does not produce bills in electronic format, which leaves Z-Tel no way to accurately reconcile bills.

13. In states where Z-Tel receives an electronic bill, Z-Tel is able to compare the telephone numbers on the wholesale bill to those in its retail billing system, compare the rates charged against the rates contained in the tariffs or interconnection agreements, compare the universal service order codes on the bill with those submitted on the original local service request, identify cases of duplicate billing, and identify cases where the port count does not equal the loop count.

14. If Z-Tel were to attempt the type of audit described above using Verizon's paper bill, Z-Tel would first have to enter every pertinent piece of information from each customer's

individual bill into a spreadsheet or database. Under Z-Tel's interconnection agreement with Verizon, bills are payable on the later of the due date shown on the bill (generally one month from the bill date) or twenty days from the date the bill is received by Z-Tel. A company the size of Z-Tel simply does not have the resources to perform this in the timeframe required.

Further, the margin between Z-Tel's wholesale costs and the retail rate we are able to charge for our product in Virginia would evaporate if we had to incur this additional expense. Verizon has not made mention of when they plan to move Z-Tel's customers from their Legacy system into their ExpressTRAK system.

15. Z-Tel continues to be billed for lines in the CSR listing rated at \$0.00. As of July 2002 Z-Tel is still being billed for 66 lines rated with no dollar amount or billing telephone number associated. Verizon has not been able to adequately explain why these zero rated charges continue to be billed nor have they given a timeframe in which this error would be rectified. These types of reoccurring billing errors that are not resolved cost Z-Tel money due to Z-Tel representatives having to contact Verizon repeatedly to inquire about resolution on this issue.

16. Verizon has been double billing Z-Tel for usage on the same phone numbers for periods that overlap each other. As an example, we are being billed usage for a period of time on the May 2002 invoice from April 23, 2002 to May 8, 2002, we then see billing usage on the June 2002 invoice for April 23, 2002 to May 22, 2002 and May 23, 2002 to June 11, 2002. Z-Tel believes that it is being double billed for calls in these usage periods where they coincide. Z-Tel has found a number of customers where usage has been double billed on our wholesale bill monthly.

IV. VERIZON HAS CREATED AN ADDITIONAL NON-REQUESTED BILLING ACCOUNT NUMBER FOR VIRGINIA CUSTOMERS

17. In December of 2001 Z-Tel began to receive billing in ExpressTRAK on a new billing account number. Z-Tel sent Verizon an email January 11, 2002 questioning the reasoning as to why we were receiving bills on a third new billing account number³. Z-Tel had already established two billing account numbers in Virginia, one for business and one for residential customers. This third billing account number was not requested and further complicated reconciling our monthly wholesale bills. Verizon responded January 18, 2002 stating that this additional billing account number was set up in error by Verizon's National Market Center⁴. They stated at that time that they were in the process of disconnecting these summary master accounts and moving all of the component accounts that are residing under them over to our valid UNEP summary master accounts in ExpressTRAK. Verizon has still not consolidated the customers from the three billing accounts to the two correctly established billing accounts. This third billing account was also billing one-time charges at a higher dollar amount than the monthly reoccurring charges. We have found that this account is not billing these rates correctly and contacted the WCC at Verizon to submit a trouble ticket⁵. To date there has been no response or resolution on this trouble ticket. On August 5, 2002 Verizon issued a credit that effectively brought all balances on this third billing account to zero. We have not however received confirmation that we will not continue to receive invoices on this billing account, nor is it clear whether the correct charges have been moved to our other accounts.

³ Email to Verizon regarding third BAN (attachment C)

⁴ Verizon's response to Z-Tel (attachment D)

⁵ Z-Tel email to Verizon regarding inaccurate one time charges (attachment E)

V. Z-TEL CURRENTLY HAS 141 OUTSTANDING DISPUTES WITH VERIZON, AND VERIZON HAS NOT FOLLOWED THEIR OWN DISPUTE ESCALATION PROCESS TO RESOLVE THESE OUTSTANDING DISPUTES

18. The majority of Z-Tel's 141 outstanding disputes with Verizon are more than 90 days outstanding⁶. Z-Tel does not often receive responses to inquiries regarding disputes. Per Verizon's dispute process outlined in Z-Tel's agreement with Verizon they should respond to us within 45 days⁷. However, Z-Tel rarely receives a response when it submits an inquiry for an update regarding the status of a dispute. When Z-Tel has requested additional information from Verizon CSR's regarding denied disputes these requests often go unanswered⁸. Z-Tel continues to seek additional information on denied disputes and still has not received adequate responses from Verizon.

VI. VERIZON'S BILLING SYSTEMS DO NOT RECOGNIZE WHEN A DISPUTE IS CREDITED OTHER THAN WHEN IT IS DONE MANUALLY; THIS VERIZON SYSTEM PROBLEM INCORRECTLY REPRESENTS Z-TEL'S OWED INVOICED AMOUNTS WITH ITS OWN COLLECTION DEPARTMENT AND LEAVES Z-TEL AT RISK FOR AN INCORRECTLY ASSESSED EMBARGO

19. If Z-Tel has a dispute that is identified as a Verizon system problem it is marked as denied and closed in the dispute log system. The closure in the dispute system causes the balance due resulting from the unpaid dispute to be deemed valid and the collections department contacts us to request payment. Verizon's collection department does not view a dispute as valid if it is not deemed so in the dispute log system. However, Verizon's response to these denials in the log system states "This is an issue that has been identified by the IT group. The credit will be

⁶ Verizon aging disputes (attachment F)


⁷ Pg. 5,6,9 of Verizon's interconnection agreement with Z-Tel Communications Inc. (attachment G)

calculated and automatically applied to your account”⁹ This lack of departmental coordination on Verizon’s part reflects incorrect invoiced amounts thus creating more difficulty in reconciling our monthly bills. It also leaves Z-Tel at risk for an embargo due to our bills consistently reflecting amounts not due to Verizon.

VII. VERIZON’S ONGOING ISSUES RELATED TO WHOLESALE BILLING CONTINUE TO COST Z-TEL MONEY IN THE FORM OF ADDITIONAL LABOR HOURS AND PROCESS WORK-AROUNDS

20. Z-Tel continues to have issues with Verizon’s wholesale billings in Virginia as described in detail above. Problems associated with billing inaccuracies, multiple billing formats, multiple billing systems, additional billing accounts, dispute resolution, and system problems cause Z-Tel to incur additional costs. Z-Tel has had to create process changes to adapt to the lack of support and initiative to correct these ongoing issues. This further complicates Z-Tel’s ability to reconcile bills when it is not able to have uniform processes for all of Verizon’s territories. Z-Tel estimates that it must incur the cost of additional hours of labor weekly directly attributed to the ongoing wholesale billing problems in Virginia. This is proves to be a large expenditure for a small local service provider such as Z-Tel.

21. This concludes my declaration.


Justin T. Laughlin
LEC Relations Manager
Z-Tel Communications, Inc.

⁸Email to Verizon requesting additional information regarding denied disputes (attachment H)

⁹ Verizon statement quoted (attachment I)

CERTIFICATE OF SERVICE

I, Charles "Chip" M. Hines III, hereby certify that a true and correct copy of the foregoing "Z-Tel Comments; WC Docket No. 02-214" was delivered this 21st day of August 2002 to the individuals on the following list:

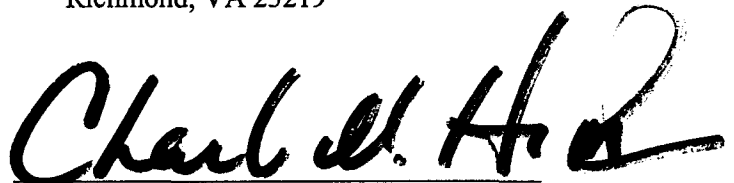
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Charles "Chip" M. Hines III

ATTACHMENT A
REDACTED –
FOR PUBLIC INSPECTION

ATTACHMENT B
REDACTED –
FOR PUBLIC INSPECTION

ATTACHMENT C
REDACTED –
FOR PUBLIC INSPECTION

ATTACHMENT D
REDACTED –
FOR PUBLIC INSPECTION

ATTACHMENT E
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ATTACHMENT F
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ATTACHMENT G
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ATTACHMENT H
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FOR PUBLIC INSPECTION

ATTACHMENT I
REDACTED –
FOR PUBLIC INSPECTION